



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In RE COMPLIANCE WITH
RCW 42.17 and RCW 42.17A

Cathy Dahlquist

Respondent.

PDC Case No. 15-036

Report of Investigation

I.
Background

- 1.1 On August 1, 2013, Cathy Dahlquist filed a Candidate Registration (C-1 report) declaring her candidacy for re-election to State Representative in the 31st Legislative District in 2014 and selecting the Full Reporting option.
- 1.2 On April 14, 2014, Cathy Dahlquist filed a Candidate Registration (C-1 report) declaring her candidacy for State Senator in the 31st Legislative District in 2014, selecting the Full Reporting option, and switching her candidacy to seek a different office in 2014. **Exhibit #1.**
- 1.3 Ms. Dahlquist is an incumbent State Representative from the 31st Legislative District since being elected to that office in 2010, and re-elected to that office in 2012. Prior to that, Ms. Dahlquist was a School Director representing the Enumclaw School District since being elected to that office in 2005 as a first-time candidate and re-elected in 2009.
- 1.4 Ms. Dahlquist was one of the top two candidates in the August 5, 2014, primary election, and appeared on the November 4, 2014 general election ballot.
- 1.5 On August 8, 2014, Pam Roach, State Senator in the 31st Legislative District and Representative Dahlquist's general election opponent, filed a complaint alleging that Ms. Dahlquist's campaign spent 2014 general election contributions prior to the 2014 primary election being held, and failed to accurately disclose joint campaign related activities that undertaken with another legislative candidate in the 31st Legislative District. **Exhibit #2.**

II.

Allegations in Complaint and Summary of Investigative Findings

- 2.1 The complaint alleged that the 2014 Cathy Dahlquist campaign (Campaign) for State Senate violated:
 - A. RCW 42.17A.405 and WAC 390-17-300(5) by spending contributions received and designated for the 2014 general election, for 2014 primary election-related activities, and by receiving in-kind contributions that exceeded the primary election contribution limits.
 - B. RCW 42.17A.235 and .240 by failing to fully disclose contributions and expenditures for transfers made with the Chris Hurst campaign for joint campaign-related advertisements and other coordinated activities.
- 2.2 For the 2014 election cycle, legislative candidates were subject to a \$950 contribution limit per election in which the candidates name appeared on the ballot. Staff queried the PDC contribution database for information filed by the Campaign, and found the Campaign disclosed receiving \$21,045 in monetary contributions designated and attributed to the 2014 general election, that were received prior to the August 5, 2014 primary election being held.
- 2.3 The \$21,045 in general election contributions included a \$1,545 transfer from the 2014 Cathy Dahlquist for State Representative campaign with the permission of the contributor. Staff subtracted that amount from the total general election contributions received prior to the August 5, 2014 Primary election for a total of \$19,500.
- 2.4 Ms. Dahlquist stated that for the 2014 election cycle she split campaign expenditures between the primary and general elections, and that she did not think of the Campaign expenditures in terms of a primary or general election expenditure. In addition, she did not think when making a Campaign expenditure that either 2014 primary or general election contributions were being spent, but rather as an expenditure for the entire 2014 election cycle.
- 2.5 PDC staff reviewed the spreadsheet that listed a total of \$27,578 in campaign expenditures of which one-half of the expenditures or \$13,788.87 were attributed by the campaign to the 2014 primary and general elections. The review found three double entries in the spreadsheet totaling \$1,632.47, and staff subtracted that amount from the expenditures totals, so that the portion of campaign expenditures made for the 2014 primary and general elections was \$12,156 for each.
- 2.6 Ms. Dahlquist stated that her Campaign made a number of expenditures for political advertisements that were either made for the 2014 general election, prior to the August 5, 2014 Primary election being held. She explained that some of the goods in question such as Campaign yard signs, flyers, paper, and toner cartridges were held in reserve and not used until the 2014 general election campaign. Those expenditures totaled \$8,308 and included the following:

- \$2,926 for one-half of campaign signs, and included \$647 for “Endorsed by” that were attached to campaign for only the general election;
- \$2,351 for one-half of Campaign flyers that were used to doorbell and leaflet for the general election;
- \$2,809 for one-third of the production costs for broadcast ads; and
- \$222 for one-half of the printed Campaign letterhead.

2.7 The Campaign made additional expenditures that were split between the primary and general elections. In those instances, the goods or services purchased by the Campaign had a continued use for the general election, but staff believes they were not of such a nature that they could be “reserved” until the primary election had passed. Staff believes those expenditures benefited Ms. Dahlquist’s primary election campaign, and were not eligible for general election funds to be spent.

2.8 Those expenditures totaled \$3,697.33 in general election expenditures that staff believes were not eligible to have been made by the Campaign until after the primary election had been held, and included the following:

- A broadcast political advertisement that was co-sponsored jointly with the Chris Hurst campaign, in which each campaign paid \$2,809 for approximately one-half of the production costs. Ms. Dahlquist stated that the joint advertisement ran prior to both the 2014 primary and general elections, and was split between the primary and general elections. Staff believes that \$1,404 of the broadcast advertisement that was attributed to the general election, the benefited the Campaign’s primary election efforts.
- The Campaign conducted two fundraisers or held two fundraising events, both prior to the August 5, 2014 primary election, and the Campaign attributed one-half of the expenditures for food, printing and mailing invitations, and insurance toward the general election totaling \$1,741.33.
- The Campaign made an expenditure to Moonshadow on May 13, 2014, which the Campaign split evenly split and attributed \$430 to the 2014 general election, for campaign software that contained demographic information about registered voters in the 31st Legislative District. The software allowed the Campaign to micro-target registered voters within each precinct of the legislative district for door-belling and get-out-the-vote (GOTV) activities.
- The Campaign made an expenditure to Visual Studio’s on April 30, 2014 for the campaign website, which the Campaign evenly split with \$75 each for the 2014 primary and general elections that included web-hosting fees for one-year and the opportunity to frequently update the campaign website throughout the 2014 election cycle.
- The Campaign made a \$93 expenditure to Sears on May 29, 2014, to purchase a drill that was used throughout the 2014 campaign to construct, assemble and repair campaign yard signs. The Campaign evenly split with \$46.50 each for the 2014 primary and general elections.

- 2.9 The Campaign received two \$1,900 in-kind contributions and attributed \$950 for the primary election and \$950 for the general election, which the complaint alleged exceeded contribution limits. Ms. Dahlquist stated both in-kind contributions were related to a June 25, 2014, fundraiser, and the campaign did not hold a general election fundraiser. She stated that she knew both in-kind contributors personally, and she did not receive an invoice or get provided a specific dollar amount to report for their services. Her Campaign reported the maximum in-kind contribution for each contributor, \$950 for the primary and \$950 for the general election.
- 2.10 Since no fundraiser was held for the 2014 general election, the campaign was allowed one \$950 in-kind contribution from each contributor. Ms. Dahlquist contacted both contributors to determine the “fair market value” of the services provided to the Campaign. She found that for one contributor, his role at the fundraiser “...will reflect the title of emcee (rather than auctioneer) and an amended \$250 in-kind contribution will be entered....” For the other contributor her Campaign received three in-kind contributions totaling \$1,250, and she will be refunding \$300 to that contributor.
- 2.11 Staff reviewed the transfers made between the Dahlquist Campaign and the Chris Hurst campaign for the 2014 election cycle for joint campaign-related advertisements and other coordinated activities. The review found that there were a number of transfers between the two campaigns for joint candidate activities, and those activities were timely reported by both candidates, although the transfers could have included a more detailed description. Finally, the Chris Hurt campaign exchanged communications with PDC staff throughout the 2014 election cycle concerning this matter.

III.

Detailed Findings

- 3.1 For the 2014 election cycle, legislative candidates were subject to a \$950 contribution limit per election in which the candidates name appeared on the ballot, except for contributions received from political party organizations and caucus political committees.
- 3.2 Staff reviewed the campaign finance reports filed by the campaign, and information queried from the PDC Contribution database and found the campaign disclosed \$21,045 in monetary contributions that were attributed to the 2014 general election contribution, but had been received prior to the August 5, 2014 primary election.
- 3.3 On September 30, 2014, Ms. Dahlquist electronically submitted her response to the allegations made in the complaints filed against her by Senator Roach. **Exhibit #3.** On February 10, 2015, staff contacted Ms. Dahlquist and sent her an email concerning the expenditures she listed in the spreadsheet that she submitted as part of her September 30, 2014 response. Staff attached a portion of the spreadsheet previously provided by Ms. Dahlquist, but added a column with PDC staff questions and issues for each expenditure.
- 3.4 On August 3, 2015, PDC conducted a telephone interview under oath with Cathy Dahlquist concerning the allegations listed in the complaint and her September 30, 2014 response. **(Exhibit #4 – summary notes of telephone interview)** The responses below incorporate the responses from Ms. Dahlquist’s telephone interview, and her September 30, 2014 email and attached spreadsheet.

- 3.5 Ms. Dahlquist stated that for 2014 and in her prior House campaigns, she split campaign expenditures between the primary and general elections for that specific election year. When her campaign made expenditures for a specific election year, she did not think of it in terms of a primary or general election expenditure. Concerning the 2014 election, she stated that a lot of her campaigns political advertisements expenditures were made or secured for the 2014 general election, prior to the 2014 Primary election being held.
- 3.6 Ms. Dahlquist acknowledged that the vendor invoices requested by staff and provided by the campaign did not indicate or designate whether or not expenditures were split between the 2014 primary and general elections. She explained that was not an issue she would have discussed with her vendors at the time the order was either placed, or the goods and/or services were provided. She added that the Online Reporting Campaign Assistance (ORCA), did not notify or prompt her campaign to designate an expenditure for a specific primary or general election.
- 3.7 Ms. Dahlquist included a spreadsheet along with her September 30, 2014 response that provided a breakdown of 21 pre-August 5, 2014 campaign expenditures that were equally split and attributed between the August 5, 2014 Primary election, and the November 5, 2014 General election. The spreadsheet included columns for the date, vendor, and total amount of the expenditure, along with columns for expenditures the campaign attributed to the general election, and provided a brief description of the purpose of the expenditure, and additional details about the campaigns accounting of the expenditures.
- 3.8 PDC staff reviewed the spreadsheet that listed a total of \$27,578 in campaign expenditures of which one-half of the expenditures or \$13,788.87 were attributed by the campaign to the 2014 general election, and \$13,788.87 in campaign expenditures were attributed for the 2014 primary election. The review found three double entries in the spreadsheet totaling \$1,632.47, and staff subtracted that amount from the expenditures totals, so that the portion of campaign expenditures made for the 2014 primary and general elections was \$12,156 for each.
- 3.9 Ms. Dahlquist stated she believed the expenditures listed in the spreadsheet qualified as general election expenses, and that: *“It is important in a busy campaign season to secure the most sought after advertising in advance, while purchasing the printing and video production in a package, as it is the most cost effective use of campaign funds.”*
- 3.10 Of the \$21,045 in monetary contributions that were attributed to the 2014 general election contribution and received prior to the August 5, 2014 primary election, the total included \$1,545 in contributions received from the 2014 Cathy Dahlquist for State Representative campaign for transfers of contributions with the permission of the contributor and attributed to the General election.

Campaign fundraisers and fundraising expenditures:

- 3.11 Ms. Dahlquist stated that she conducted two campaign fundraisers or fundraising events for her 2014 Senate campaign, both prior to the August 5, 2014 primary election that included:

1. A June 24, 2014, joint-campaign fundraiser with the 2014 Chris Hurst Campaign in which the contributions and expenditures were evenly split; and
2. A June 25, 2014, campaign fundraiser that was held at Kelley Farms.

3.12 Ms. Dahlquist stated that she did not think of the fundraiser in terms of being a primary or general election fundraiser, since her campaign expected to receive both primary and general election contributions at the event. She stated the campaign made the following campaign expenditures for the June 25, 2014, campaign fundraiser at Kelley Farms:

- Mama Stortini's: The campaign made two expenditures to Mama Stortini's for food for the June 25, 2014 fundraising event totaling \$2,100 that included: (1) A \$500 campaign expenditure was made on June 12, 2014, which the Campaign split evenly with \$250 each for the primary and general election; and (2) A \$1,600.48 campaign expenditure was made on June 24, 2014, which the Campaign split evenly with \$800.24 each for the primary and general elections.
- A \$395 campaign expenditure was made to Gale's Creek Insurance on June 23, 2014, for insurance for the campaign event at Kelley Farms, which the Campaign split evenly with \$197.50 each for the primary and general election.
- Three campaign expenditures were made to Print NW totaling \$987.66 to print invitations for the Kelley Farm event, which the Campaign split evenly with \$493.83 each for the primary and general elections. The Campaign expenditures to Print NW were reported as being made as follows: (1) June 12, 2014 totaling \$207.76; (2) July 11, 2014 totaling \$462.64; and (3) July 11, 2014 totaling \$317.26.

Political Advertisements:

3.13 Ms. Dahlquist that during the 2014 election cycle, when her campaign made expenditures for political advertising she did not think of the expenditure in terms of being a primary or general election expenditure, but instead a 2014 expenditure for election to State Senator. She equated the contributions received in that manner due to contribution limits. She stated that for most types of political advertisements such as yard signs and campaign flyers, it is advantageous for the campaign to place as large an order at one time, and whenever possible for the entire campaign, because the campaign receives a "reduced bulk rate" for services.

3.14 Ms. Dahlquist stated the campaign had a process for separating, segregating, or storing 2014 primary and general election goods and services, including political advertisements, that were paid for with general election contributions prior to the primary election being held. She referred to the spreadsheet she provided as part of her response for the expenditures made by the Campaign and are detailed below.

Spectrum Signs:

3.15 The campaign made two expenditures to Spectrum Signs totaling \$4,557.39 to purchase yard signs that were used by the campaign for both the 2014 primary and general elections as follows:

1. A \$1,359.99 expenditure was made on April 30, 2014, which the Campaign split evenly with \$680 each for the 2014 primary and general election.
 2. A \$3,197.40 expenditure was made on June 6, 2014, which Campaign split evenly split with \$1,598.70 each for the 2014 primary and general elections.
- 3.16 The campaign made a third expenditure to Spectrum Signs on July 28, 2014 totaling \$647 for an “Endorsed by” sign that was attached to existing yard signs or newly placed yard after the August 5, 2014 primary election had been held. She stated that the campaign made that expenditure prior to the August 5, 2014 primary election, but indicated only general election funds were used.
- 3.17 Ms. Dahlquist stated that approximately one-half of the signs were stored in a portion of the room in her house that she used as her campaign office. She stated the campaign signs did not come assembled, so the campaign constructed the signs on an as needed basis throughout the 2014 election cycle. When asked she stated that she did not take any photographs in the area of the campaign office where the yard signs and other campaign materials were stored, since she did not think there was any reason to document that practice.
- 3.18 Ms. Dahlquist stated the general election campaign yard signs were either placed at new locations after the primary election had been, or replaced previously placed yard signs that had been damaged, stolen, or otherwise gone missing. She stated that she had discussions with her campaign staff and volunteers concerning yard signs, and the campaign’s strategic decision to place one-half of the yard signs before the primary election and place the other half after the primary election had been held. She added that the campaign did order additional signs prior to the general election since so many of the campaign signs ended up missing that the signs stored for the general election had already been distributed.

Green Light Strategies: Campaign Flyer

- 3.19 On May 12, 2014, the Campaign made an expenditure to Green Light Strategies totaling \$4,702.38 to print flyers, which the Campaign split evenly split with \$2,351.19 each for the 2014 primary and general elections. Ms. Dahlquist stated the flyer was the Campaign’s only “doorbelling” advertisement printed and that she distributed the flyer for the entire 2014 election. She stated that the Campaign’s door-belling activities were “micro-targeted” using the Moonshadow software that she purchased in May of 2014 (see below).
- 3.20 Ms. Dahlquist stated that she visited one set of registered voters for the primary election, and a completely different set of registered voters for the general election, so she never door-belled the same household twice which allowed her to use the same flyer for the entire election. She stated the flyers were stored in the campaign office and used as needed, and she noted that they were divided pretty evenly between the 2014 primary and general elections. She added that she probably door-belled close to the same number of households for the 2014 primary and general elections.

Green Light Strategies: Broadcast Advertisements

- 3.21 Ms. Dahlquist stated the Campaign made three expenditures to Green Light Strategies on July 28, 2014, totaling \$8,426, which the Campaign split evenly split with \$4,123 each for the 2014 primary and general elections. She stated the expenditures were for a video shoot and production of three separate broadcast political advertisements.
- 3.22 Ms. Dahlquist stated that one broadcast political advertisement ran prior to the August 5, 2014 primary election being held, and that one advertisement ran after the primary election but before the 2014 general election. She stated that the third broadcast political advertisement was co-sponsored jointly with the Chris Hurst campaign, and each campaign paid for approximately one-half of the costs. She stated that Dahlquist-Hurst joint advertisement ran prior to both the 2014 primary and general elections, and was designated accordingly.

Capital City Printer: Campaign letterhead

- 3.23 On July 14, 2014, the Campaign made an expenditure to Capital City Printer totaling \$445.26 to campaign letterhead, which the Campaign split evenly split with \$222.63 each for the 2014 primary and general elections. Ms. Dahlquist stated the campaign used the letterhead for both 2014 primary and general election mailings and correspondence.

Other Campaign Expenditures:

Moonshadow:

- 3.24 On May 13, 2014, the Campaign made an \$860 expenditure to Moonshadow which the Campaign split evenly split with \$430 each for the 2014 primary and general elections. The expenditure was for campaign software that contained demographic information about registered voters in the 31st Legislative District. The software allowed the Campaign to strategically micro-target registered voters within each precinct of the legislative district for door-belling and get-out-the-vote (GOTV) activities.
- 3.25 Ms. Dahlquist stated that the campaign used the software extensively for both the 2014 primary and general elections to identify registered voters and enter information or make notes about a voter such as issues discussed, the voter's preferences, does the voter want a yard sign or to make a contribution or to be a volunteer, etc. Staff noted that the expenditure to Moonshadow was made one day after the \$4,702 expenditure to Green Light Strategies for the doorbelling piece that was used in conjunction with the software.

Visual Studio's

- 3.26 The Campaign made a \$150 expenditure to Visual Studio's on April 30, 2014 for the campaign website, which the Campaign evenly split with \$75 each for the 2014 primary and general elections. Ms. Dahlquist stated the expenditure included web-hosting fees for one-year and the opportunity to frequently update the campaign website, which occurred throughout the 2014 election cycle.

Arrow Lumber:

- 3.27 The campaign made two expenditures to Arrow Lumber totaling \$243.42 on June 6, 2014, to purchase stakes, lathes and screws which was used to construct the campaign yard signs. Ms. Dahlquist stated the yard signs materials were used by the campaign for both the 2014 primary and general elections, which the Campaign split evenly with \$121.71 each for the 2014 primary and general election.

Office Depot:

- 3.28 The campaign made an expenditure to Office Depot totaling \$217.59 on May 29, 2014, to purchase campaign office supplies including bulk paper and printer cartridges, which the Campaign split evenly with \$108.80 each for the 2014 primary and general election. Ms. Dahlquist stated the paper and printer cartridges were stored in the campaign office used by the campaign for both the 2014 primary and general elections.

Sears:

- 3.29 The Campaign made a \$93 expenditure to Sears on May 29, 2014, to purchase a drill that was used throughout the 2014 campaign to construct, assemble and repair campaign yard signs, which the Campaign evenly split with \$46.50 each for the 2014 primary and general elections. Ms. Dahlquist stated that the drill was a necessary purchase since the campaign signs are not constructed, so the Campaign has to purchase the signs, stakes, lathes, and screws separately and then construct each sign individually. She noted that the drill purchased at Sears was used by the campaign to attach the "Endorsed by" signs for the general election.

General Election In-kind Contributions received prior to 8/5/2014 Primary election

- 3.30 Staff reviewed the in-kind contributions received by the Campaign and found the campaign disclosed receiving two in-kind contributions totaling \$1,900 each that were prior to the August 5, 2014 primary election being held, and attributed one-half of the in-kind contribution amount to the general election. Both in-kind contributions were received for a June 25, 2014 event and included the following descriptions:
- John Curley Auctioneer: In-kind contributions for donated services as an Auctioneer for a Campaign fundraiser held on June 27, 2014, with \$950 attributed to the primary election, and \$950 attributed to the general election.
 - Kelley Farm: In-kind contribution for donated services of the facility including the use of the farm and barn for a campaign fundraiser held on June 27, 2014, with \$950 attributed to the primary election.
- 3.31 Ms. Dahlquist stated that the two \$1,900 in-kind contributors received by the Campaign from John Curley Auctioneers and Kelley Farms were both related to a June 25, 2014, fundraiser. She stated that the in-kind contributions were for only one fundraising event, and no fundraiser was held for the 2014 general election.

- 3.32 Ms. Dahlquist stated she knew both Mr. Curley and Sandy Corliss, the owner of Kelly Farms personally, and that she did not receive an invoice for their services and they did not provide her with a specific dollar amount to report. Since she did not have a discussion with either Mr. Curley or Ms. Corliss about the amount to report as an in-kind contribution for the services provided, her Campaign reported the maximum in-kind contribution for each contributor, \$950 for the primary and \$950 for the general election.
- 3.33 Staff discussed with Ms. Dahlquist the need for her to communicate with the two individuals to establish a “fair market value” for their services. Ms. Dahlquist stated that after she received staff’s July 2015 email concerning the in-kind contributions, she reviewed the 2014 Statewide Executive and Legislative candidate reporting manual, and found information on page 44 of the manual that stated a candidate can’t accept general election goods or services, until after the primary election has been held. She understood at that time that it appeared likely that she had “over-reported” the amount for the services provided, which meant her campaign exceeded the 2014 primary contribution limits for both of those contributors.
- 3.34 Staff exchanged several emails with Ms. Dahlquist in September of 2015, concerning the in-kind contributions reported as being received from Mr. Curley and Ms. Corliss, and assisting her in establishing a “fair market value” for those services provided to her Campaign.
- 3.35 Ms. Dahlquist contacted John Curley and determined from their discussions that his role at the fundraiser “...will reflect the title of emcee (rather than auctioneer) and an amended \$250 in-kind contribution will be entered...” by the Campaign on an amended C-4 report. Ms. Dahlquist stated that after contacting Ms. Corliss and discussing the matter she determined that her Campaign received three in-kind contributions from Kelley Farms totaling \$1,250 for three separate in-kind contributions of \$416.66 each (as opposed to the \$1,900 previously reported).
- 3.36 Ms. Dahlquist’s treasurer has been working to amend her C-4 reports to accurately reflect the in-kind contributions that were received, and refund any over-limit in-kind contributions received from Kelley Farms. The Campaign has experienced difficulties re-installing the ORCA software and in transmitting the amended C-4 report.

Campaign transfers with the 2014 Chris Hurst campaign:

- 3.37 Ms. Dahlquist stated that during the 2014 election, there was no liabilities to disclose between her Campaign and the 2014 Chris Hurst for State Representative Campaign, since there were no liabilities incurred. She stated concerning the complaint that the shared advertisements and the Campaign’s decision to purchase one-half of a newspaper ad with the Chris Hurst campaign were: “...made on a weekly basis based on if our campaign had the available funds.”
- 3.38 Ms. Dahlquist stated that everyone in the district was aware that her Campaign and the 2014 Chris Hurst for State Representative Campaign were campaigning together. She stated the campaigns conducted activities jointly and proportionally shared campaign resources that included broadcast and newspaper advertisements, flyers, canvassing and get-out-the-vote efforts.

- 3.39 Ms. Dahlquist reiterated that there were no liabilities incurred for the shared activities with the Chris Hurst campaign, since those decisions were made as campaign funds were available. She stated the shared campaign expenditures with the Citizens for Chris Hurst campaign were also detailed on either the C-3 or C-4 reports for each campaign, depending on which campaign was being reimbursed. The reimbursements or shared expenditures were for political advertising in the form of newspaper ads and flyers, canvassing and other get-out-the-vote efforts.
- 3.40 During the 2014 campaign, Representative Hurst communicated with PDC staff on a number of occasions concerning the joint campaign activities and the reporting requirements for those activities between the two campaigns.

IV. **Scope**

- 4.1 PDC staff reviewed the following documents:

- The complaint filed by Pam Roach against Cathy Dahlquist on August 8, 2014.
- C-3 reports and C-4 reports filed by the Cathy Dahlquist campaign.
- Queried the PDC contribution and expenditure databases concerning Cathy Dahlquist.
- September 30, 2014, response submitted by email from Cathy Dahlquist that included a spreadsheet and additional documentation.
- March 12, 2015, email exchange with Cathy Dahlquist in which she attached a number of campaign invoices.
- May 28 and 29, 2015, email exchange with Cathy Dahlquist in which she attached campaign invoices.
- August 3, 2015, in-person interview under oath with Ms. Dahlquist.
- September 2015, email exchange with Cathy Dahlquist concerning over-limit in-kind contributions received by the Campaign.

V. **Laws**

- 5.1 **RCW 42.17A.405(2)** states in part:

“No person, other than a bona fide political party or a caucus political committee, may make contributions to a candidate for a legislative office, county office, city council office, mayoral office, school board office, or public hospital district board of commissioners that in the aggregate exceed eight hundred dollars or to a candidate for a public office in a special purpose district or a state office other than a legislative office that in the aggregate exceed one thousand six hundred dollars for each election in which the candidate is on the ballot or appears as a write-in candidate. Contributions to candidates subject to the limits in this section made with respect to a primary may not be made after the date of the primary.”

- 5.2 **WAC 390-17-300** states in part:

“Any portion of an undesignated contribution made prior to the date of the primary which exceeds the contributor's primary election contribution limit shall be attributed to the contributor's limit for the general election.

(4) Contributions for the primary election shall be accounted for separately from those for the general election...”

“(5) General election contributions shall not be spent for the primary election if to do so would cause the contributor of the general election contribution to exceed that contributor's contribution limit for the primary election.

Respectfully submitted this 12th day of October, 2015.

Kurt Young
PDC Compliance Officer

List of Exhibits

- Exhibit #1** Candidate Registration (C-1 report) filed by Cathy Dahlquist declaring her candidacy for State Senator in the 31st Legislative District in 2014
- Exhibit #2** Complaint filed against Cathy Dahlquist by Pam Roach.
- Exhibit #3** September 30, 2014, response letter and attached spreadsheet electronically submitted by Cathy Dahlquist to the allegations made in the complaint.
- Exhibit #4** Summary notes of an August 3, 2015, telephone interview conducted under oath with Cathy Dahlquist concerning the allegations listed in the complaint.